

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 WILD HORSE EDUCATION, and
4 LAURA LEIGH, individually,

5 *Plaintiffs,*

6 v.

7 U.S. DEPARTMENT OF INTERIOR,
8 BUREAU OF LAND MANAGEMENT,
9 and JOHN RABY, in his official capacity as
Nevada State Director of the Bureau of Land
Management,

10 *Federal Defendants.*

Case No. 3:23-cv-00372-MMD-CLB

DECLARATION OF Robbie Purdie-Williams

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12 I, Robbie Purdie-Williams, state the following:

13 1. I am the District Manager for the Ely District, Bureau of Land Management (BLM) in
14 Nevada. I have held that position since August 16, 2020 and have worked for the BLM since
15 2006 in various capacities.

16 2. My responsibilities in my current position include overseeing the compilation of the
17 pertinent documents for the Administrative Record for the above-captioned action.

18 3. I am generally familiar with the documents that are part of the administrative record for
19 the BLM's December 12, 2017 Decision Record that approved the Antelope and Triple B
20 Complexes Wild Horse Gather Plan. I am also familiar with the process by which the documents
21 considered directly or indirectly by the BLM as part of its decision-making process for the
22 challenged decision were collected and compiled into the Administrative Record.

23 4. To the best of my knowledge and based on my involvement in overseeing the
24 development of the Administrative Record, I hereby certify that the Administrative Record is a
25 true, correct, and complete copy of the documents that were directly or indirectly considered by
26 BLM for the Decision Record as pertinent to the claims raised in the above-captioned matter.

27 5. I declare under penalty of perjury that the foregoing is true and correct.
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3 Robbie Purdie-Williams
4 Ely District Manager
5 Nevada Bureau of Land Management
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